

EXHIBIT 14

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3 UNITED STATES DISTRICT COURT
4 DISTRICT OF MASSACHUSETTS

5 No. 04-CV-11948-RGS

6 SEYED MOHSEN HOSSEINI-SEDEHY,

7 Plaintiff

8 vs.

9 ERIN T. WITHINGTON and the CITY

10 OF BOSTON,

11 Defendants

12
13 DEPOSITION OF ERIN T. WITHINGTON

14 Thursday, March 31, 2005

15 10:00 a.m. - 4:32 p.m.

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24 Reporter: Cynthia C. Henderson/RPR

Erin T. Withington - March 31, 2005

<p style="text-align: right;">86</p> <p>1 Q. And having exact date, does that affect the 2 amount of proof that you as a criminal investigator 3 have in any investigation? 4 A. It can if I can put someone there or not 5 there on the exact date, then, yes. 6 Q. If you have an exact date, it's more proof 7 than if you have an allegation without an exact 8 date; right? 9 A. Yes. 10 Q. And one of the concerns you had in 11 investigating Joe Bavis's allegations was that there 12 was no exact date; correct? 13 A. Yes. 14 (Weekly disability claim for Joe 15 Bavis marked Exhibit No. 2 for 16 identification.) 17 Q. I place before you what has been marked 18 Exhibit No. 2. 19 A. Okay. 20 Q. I know that you mentioned the name Bill 21 Dodd at the bottom here. There may have been more 22 than one Dodd working for the Teamsters for GES too, 23 so I know the name Dodd had come up before. 24 A. Yes.</p>	<p style="text-align: right;">88</p> <p>1 had known about it? 2 MS. AMBARIK: Objection. You can 3 answer. 4 Q. During your criminal investigation. 5 MS. AMBARIK: Objection. You can 6 answer. 7 A. It would have made me ask him maybe 8 different questions like "Were you working?", things 9 like that. 10 Q. What questions? 11 A. "Were you working at the time this incident 12 occurred?" 13 Q. And why would you ask that question? 14 A. According to the paperwork, he didn't work 15 for it seems from November of 2002 to -- I don't 16 have an end date yet, so I don't know when. 17 Q. But you would ask him that question because 18 it would concern you as to whether or not the 19 allegations were true; correct? 20 A. If I had this paper, yes. 21 Q. Yes. If you had the paper. 22 A. Yes. 23 MR. BUTLER: Can I have that marked 3, 24 please?</p>
<p style="text-align: right;">87</p> <p>1 Q. Just like the Perrys? 2 A. A lot of names came up a few times. 3 Q. And can you describe what this document 4 appears to be? 5 A. Weekly disability claim for -- 6 Q. And who was the claimant? 7 A. Joe Bavis. 8 Q. And does that appear to be the same person 9 that made the criminal allegations against Mr. 10 Hosseini on or about December 22nd, 2003? 11 A. The address is the same, yes. 12 Q. And the date of this application for 13 disability form, that's at the bottom of the second 14 box. 15 A. Yes. 16 Q. And what is that? 17 A. December 18, 2002. 18 Q. Now, were you aware that Mr. Bavis had 19 filed for weekly disability insurance on December 20 18, 2002 when you conducted the investigation into 21 Joe Bavis's allegations? 22 A. No. 23 Q. Would that information, the information 24 contained in Exhibit 2, be significant to you if you</p>	<p style="text-align: right;">89</p> <p>1 (Weekly disability approval form 2 for Joe Bavis marked Exhibit No. 3 3 for identification.) 4 Q. And when you are done looking at the 5 document, just look up and that will indicate to me 6 to ask you a question. What does Exhibit 3 appear 7 to be? 8 A. A weekly disability approval form. 9 Q. For whom? 10 A. Joe Bavis. 11 Q. And what was the date of the sickness or 12 disability for Bavis's weekly disability form? 13 A. November 30, 2002. 14 Q. And the date just above that? 15 A. November 23rd, 2002. 16 Q. That would be for the date of disability or 17 sickness, November 23rd, 2002? 18 A. Yes. 19 Q. And according to this form, when did the 20 benefits for Mr. Bavis get exhausted at the bottom 21 there? 22 A. May 30, 2003. 23 Q. Were you aware of the information contained 24 in Exhibit 3 when you conducted your investigation</p>